

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04900043-2013**
Application Received: **February 12, 2013**
Plant Identification Number: **03-54-049-00043**
Permittee: **FibreK Recycling U.S. Inc.**
Facility Name: **Fairmont Mill**
Mailing Address: **702 AFR Drive, Fairmont, WV 26554**

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| Physical Location: | Fairmont, Marion County, West Virginia |
| UTM Coordinates: | 575.30 km Easting • 4375.10 km Northing • Zone 17 |
| Directions: | From I-79, Exit 137, follow Route 310 North. Stay in right lane to Speedway. Go straight at traffic light. Travel on Speedway (Route 73) for approximately one (1) mile. Just past Novelis turn left on Suncrest Boulevard. Continue straight through four (4)-way stop. Turn left down the hill onto Hoult Road. Take an immediate right and follow straight to AFR Drive. |

Facility Description

FibreK Recycling U.S. Inc.'s Fairmont Mill is a de-inked market pulp mill with a SIC code of 2611 and a NAICS code of 322110. Office waste paper is pulped, cleaned of contaminants, washed, and pressed. Ink and adhesives are removed; the pulp is thickened, bleached, dewatered, and dried to form a final pulp sheet. Hydrogen peroxide, sodium hydroxide, sodium silicate, and formamidine sulfinic acid are used in the bleaching processes; chlorine is not. The facility has the potential to operate twenty-four (24) hours per day for seven (7) days per week and fifty-two weeks per year.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
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| Regulated Pollutants | Potential Emissions | 2011 Actual Emissions |
| Carbon Monoxide (CO) | 111 | 54.02 |
| Nitrogen Oxides (NO _x) | 81.2 | 25.33 |
| Particulate Matter (PM _{2.5}) | 19.97 | 15.62 |
| Particulate Matter (PM ₁₀) | 19.97 | 15.62 |
| Total Particulate Matter (TSP) | 19.97 | 15.62 |
| Sulfur Dioxide (SO ₂) | 0.21 | 0.10 |
| Volatile Organic Compounds (VOC) | 2.50 | 1.90 |
| <i>PM₁₀ is a component of TSP.</i> | | |
| Hazardous Air Pollutants | Potential Emissions | 2011 Actual Emissions |
| NONE | | |
| <i>Some of the above HAPs may be counted as PM or VOCs.</i> | | |

Title V Program Applicability Basis

This facility has the potential to emit 111 tons per year of carbon monoxide. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Fibrek Recycling U.S. Inc.'s Fairmont Mill is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

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| Federal and State: | 45CSR2 | To Prevent and Control Particulate Air Pollution from the Combustion of Fuel in Indirect Heat Exchangers |
| | 45CSR6 | Control of Air Pollution from Combustion of Refuse |
| | 45CSR7 | To Prevent and Control Particulate Matter (PM) Air Pollution from Manufacturing Processes and Associated Operations |
| | 45CSR10 | To Prevent and Control Air Pollution from the Emission of Sulfur Dioxide |
| | 45CSR11 | Prevention of Air Pollution Emergency Episodes |

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| | 45CSR13 | Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation |
| | 45CSR16 | Standards of Performance for New Stationary Sources |
| | WV Code § 22-5-4 (a) (14) | Air Quality Management Fee Program |
| | 45CSR30 | Requirements for Operating Permits |
| | 40 C.F.R. Part 60 Subpart Db | Standard of Performance for Industrial-Commercial-Institutional Steam Generating Units |
| | 40 C.F.R. Part 61 Subpart M | Asbestos Inspection and Removal |
| | 40 C.F.R. Part 82 Subpart F | Ozone Depleting Substances |
| State Only: | 45CSR4 | To Prevent and Control the Discharge of Air Pollutants into the Open Air which Causes or Contributes to an Objectionable Odor or Odors |

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit (<i>if any</i>) |
|--------------------------------|------------------|--|
| R13-1525C | February 7, 2003 | |

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Since R30-04900043-2008 was issued, there have been no changes to the Fibrek Recycling U.S. Inc.'s Fairmont Mill Title V Permit.

The following updates were made in this renewal permit:

1. The Emission Unit Table 1.1 was not revised since the facility did not add, revise or delete any equipment between the 2008 and the 2013 renewal.
2. 45CSR34 incorporates and is now cited with 40 C.F.R. Part 61 because 45CSR15 was repealed. The citation for 3.1.3 has been revised accordingly.
3. The boilerplate language for Section 3.3.1 was revised with the addition of Section 3.3.1.d and the citation was also revised to expand the authority of the West Virginia state code.
4. Sections 3.5.3 and 3.5.5 were revised according to US EPA Region 3's request that all annual compliance certifications be submitted electronically (e-mail). Also, the US EPA Region 3 address in Section 3.5.3 was revised. This is a general change to the boiler plate language.
5. The following minor changes were made to the 40 C.F.R. Part 60 Subpart Db requirements.

| Section | Revision |
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| 4.1.10. | Revised as follows: |
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No owner or operator of an affected facility that is subject to the provisions of 40 C.F.R. § 60.44b and that combust only coal, oil, or natural gas shall cause to be discharged into the atmosphere from that affected facility any gases that contain ~~NO_x nitrogen oxides~~ (expressed as NO₂) in excess of 0.10 LB/MMBtu (18.60 LB/hour) for a low heat release rate. Compliance with this limit shall be demonstrated through compliance with the more stringent permit R13-1525C hourly ~~NO_x nitrogen oxides~~ limit set forth in Section 4.1.1.

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| 4.2.1. | Revised as follows: |
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~~Continuous monitors shall be installed and maintained for the measurement of nitrogen oxides and oxygen concentrations at emission point 001E.~~

The owner or operator of an affected facility is subject to the NO_x standard under 40 C.F.R. § 60.44b shall install, calibrate, maintain, and operate CEMS for measuring NO_x and O₂ (or CO₂) emissions discharged to the atmosphere, and shall record the output of the system at emission point 001E.

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| 4.2.2. | Changed all references for "continuous monitoring system" to "CEMS." |
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| 4.2.3. | Revised as follows: |
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The 1-hour average ~~NO_x nitrogen oxides~~ emission rates measured by the continuous ~~NO_x nitrogen oxides~~ monitor required by Section 4.2.1~~2~~ and required under 40 C.F.R. § 60.13 (h) shall be expressed in ng/J or LB ~~lb/MMmillion~~ Btu heat input and shall be used to calculate the average emission rates under 40 C.F.R. § 60.44b and as required by Section 4.1.10. The 1-hour averages shall be calculated using the data points required under 40 C.F.R. § 60.13 (h) (2). ~~At least 2 data points must be used to calculate each 1-hour average.~~

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| 4.2.4. | Replaced "nitrogen oxides" with "NO _x ." |
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| 4.2.5. | Replaced "nitrogen oxides" with "NO _x " and "continuous monitoring system" to "CEMS." |
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- 4.3.1. Replaced “nitrogen oxides” with “NO_x.”
- 4.3.2. Replaced “nitrogen oxides” with “NO_x” and added “40 C.F.R. § 60.48b (g) (2)” to the second sentence.
- 4.4.2. Replaced “nitrogen oxides” with “NO_x” and replaced “a through j” with “4.4.2.1 through 4.4.2.10.”
- 4.4.2.4. Revised as follows:
- Identification of the steam generating unit operating days when the calculated 30-day average NO_x ~~nitrogen oxides~~ emission rates are in excess of the limitation established in Section 4.1.10, with the reasons for such excess emissions as well as a description of corrective actions taken.
- 4.4.2.9. Revised as follows:
- Description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3 ~~performance specifications~~.
- 4.5.1. Replaced:
- The permittee shall submit a quarterly exception report to the Director. The report shall provide details of all excursions outside the permit limit from Section 4.1.10 of 0.10 LB/MMBtu (18.60 lb/hr) of nitrogen oxides. The report shall include, but not be limited to, the time of the excursion, the magnitude of the excursion, the duration of the excursion, the cause of the excursion and the corrective action taken.
- With:
- The permittee is required to submit excess emission reports for any excess emissions that occurred during the reporting period. For purposes of 40 C.F.R. § 60.48b (g) (1), excess emissions are defined as any calculated 30-day rolling average NO_x emission rate, as determined under 40 C.F.R. § 60.46b (e), that exceeds the applicable emission limits in 40 C.F.R. § 60.44b.
- 4.5.2. Replaced:
- Information collected in Section 4.2.2 shall be submitted to the Director on a quarterly basis.
- With:
- The owner or operator of any affected facility subject to the continuous monitoring requirements for NO_x under 40 C.F.R. § 60.48 (c) [Section 4.2.2.] shall submit reports containing the information recorded under 40 C.F.R. § 60.49b (g) [Section 4.4.2.].
- Deleted 45CSR§30-5.1.c from the citation.

Quarterly reporting requirements [40 C.F.R. § 60.49b (v)] were added as Section 4.5.3 changes to accompany Sections 4.5.1 and 4.5.2, while the previous Section 4.5.3 was renumbered as Section 4.5.4.

6. 45CSR13, R13-1525, B.9 was added to the citations in Sections 4.1.10, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.3.1, 4.3.2, 4.4.2, 4.5.1, and 4.5.2. R13-1252C condition B.9 states that the the permitted facility shall comply with all applicable provisions of 40 C.F.R. Part 60 Subpart Db.

Fibrek Recycling U.S. Inc. has not submitted any modifications to the Fairmont Mill that triggered a PSD permit; therefore, the requirements of the GHG tailoring rule do not apply.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

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| 45CSR21 | <i>Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.</i> This facility is located in Marion County and is not included in the listed counties. |
| 45CSR27 | <i>To Prevent and Control the Emissions of Toxic Air Pollutants.</i> This rule does not apply to this facility as it does not emit any of the listed toxic air pollutants. |
| 45CSR29 | <i>Rule Requiring the Submission of Emission Statements for Volatile Organic Compound Emissions and Oxides of Nitrogen Emissions.</i> This rule applies only to stationary sources located in Putnam, Kanawha, Cabell, Wayne, Wood, and Greenbrier Counties. This facility is located in Marion County; therefore, it is exempt from this rule. |
| 40 C.F.R. Part 60 Subpart Kb | <i>Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.</i> This facility does not store volatile organic liquids in storage tanks that meet the requirements of the rule. Additionally, Pulp and Paper facilities are not subject to NSPS Subpart Kb as long as the vessels are flow-through process tanks (per Applicability Determination Index, #9800099) |
| 40 C.F.R. Part 63 Subpart S | <i>National Emissions Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.</i> This facility is not a major source of HAPs; therefore, it is not subject to this rule. |
| 40 C.F.R. Part 63 Subpart ZZZZ | <i>National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.</i> The Fairmont Mill is not subject since it does not own or operate a Reciprocating Internal Combustion Engine. |
| 40 C.F.R. Part 63 Subpart DDDDD | <i>National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.</i> Since the Fairmont Mill boiler is not a major source of HAPs (10 tons per year or more of one HAP or 25 tons per year or more of total HAPs), its boiler is not subject to 40 C.F.R. Part 63 Subpart DDDDD according to 40 C.F.R. § 63.7485. |
| 40 C.F.R. Part 63 Subpart JJJJJJ | <i>National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.</i> Since the Fairmont Mill's boiler is gas fired, it is not subject to 40 C.F.R. Part 63 Subpart JJJJJJ according to 40 C.F.R. § 63.11195 (e). |

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| 40 C.F.R. Part 64 | This is the second permit renewal for this facility. The facility was found not to be subject to <i>Compliance Assurance Monitoring (CAM)</i> at the time of the first renewal since the facility did not have any pollutant specific emissions units (PSEU) that satisfied all of the applicability criteria requirements of 40 C.F.R § 64.2 (a). There have been no changes to any PSEUs at the facility since the first renewal that have resulted in a source satisfying the applicability requirements of 40 C.F.R. § 64.2 (a) and becoming subject to CAM. |
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Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: April 19, 2013
Ending Date: May 20, 2013

All written comments should be addressed to the following individual and office:

Wayne Green
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. (1258) • Fax: 304/926-0478

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.